

June 16, 2011

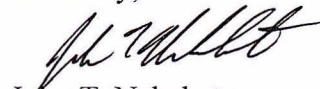
Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42; *Federal State Joint Board on Universal Service*, CC Docket No. 96-45; *Lifeline and Link Up*, WC Docket No. 03-109

Dear Ms. Dortch:

On June 15, 2011, Mary Henze of AT&T and I spoke with Kim Scardino of the Telecommunications Access Policy Division, Wireline Competition Bureau. We urged the Commission to make clear that, to the extent an autodialed or pre-recorded call is placed to a residential or wireless telephone as part of the duplicates resolution process, the consumer has given prior express consent to receipt of those program integrity calls as a result of enrolling in the Lifeline program and accepting the Lifeline benefit. *See Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991; Request of ACA International for Clarification and Declaratory Ruling*, 23 FCC Rcd 559, 565 (2008). Accordingly, such calls are permitted under 47 U.S.C. 227(b)(1)(A)(iii), (b)(1)(B) and (b)(2)(B).

Sincerely,



John T. Nakahata
Counsel to General Communication, Inc.

cc: Kimberly Scardino